

August 18, 2000

Mr. Paul Peronard
US EPA
EPR-SA
999 18th St, Suite 500
Denver, CO 80202

Mr. Paul Peronard
US EPA
501 Mineral Avenue
Libby, Montana 59923

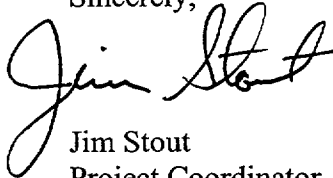
Re: **Addendum 2 to Approved Work Plan dated July 28, 2000**
Libby Asbestos Site (#8-BC), Libby, Lincoln County, Montana

Dear Mr. Peronard:

Please find attached, for your review and approval, Addendum No. 2, revising Section 4, Implementation Schedule in the above referenced work plan.

Thank you in advance for your immediate attention with this matter. Please call if you have any questions concerning this submittal.

Sincerely,



Jim Stout
Project Coordinator
Libby Asbestos Site

cc: Jon Constan, Montana Department of Environmental Quality (3 copies)
Ken Lund, Holme Roberts & Owen
Bob Mariam, WR Grace
David Cleary, WR Grace
Karen Brown, WR Grace
Matthew Cohn, US EPA

ADDENDUM NO. 2
Work Plan – Removal of Asbestos and Vermiculite
at the Export Plant, Libby Asbestos Site
28 July 2000

This addendum to the 28 July 2000 Work Plan for the removal of asbestos and vermiculite at the Libby Asbestos Site is issued to amend the implementation schedule and sequence of performing activities. See Section 4.0 and the schedule, Figure 4.1.

On 11 August 2000, the EPA, Millwork West and WR Grace reached an agreement on the relocation of Millwork West's retail business to temporary pole barn structure(s) at a site in Libby, Montana.

Due to the extended negotiation period to reach agreement with Millwork West involving review and rejection of six locations and arrangements of the buildings on specific sites, project delays have been encountered.

The most significant delay is the ordering and delivery of the temporary pole buildings. Design of the structures had to be postponed until agreement. This impact has delayed erection of both buildings to September 23, 2000, and a final movement of retail materials to September 30, 2000.

To offset these delays, both the planer building and small shed will be cleaned under controlled conditions prior to September 25. This is reflected in the revised schedule (attached).

However, the installation of the decon pad, site enclosure restriction fencing, pole building cleaning and soil excavation is postponed, and these control the remaining schedule. Completion of surface excavation and transportation to the mine is now forecasted for November 25, 2000. This delay has moved activities into the winter season at the location.

Building cleaning can be accomplished by utilizing heaters, as necessary. Soil excavation, removal and transport to the mine may be accomplished completely if severe weather and snow do not make transportation and excavation operations unsafe at the export plant, over Rainy Creek Road or at the mine. Restoration completion at the export plant, final hydroseeding and restoration of the final grading and seeding/planting at the mine is not feasible during the winter season.

The attached revised schedule reflects restoration upon return of favorable seasonal conditions in April and completion on May 12, 2001. Actual work is performed in the allotted 20 weeks, however, a winter shutdown is required and shown in the schedule.

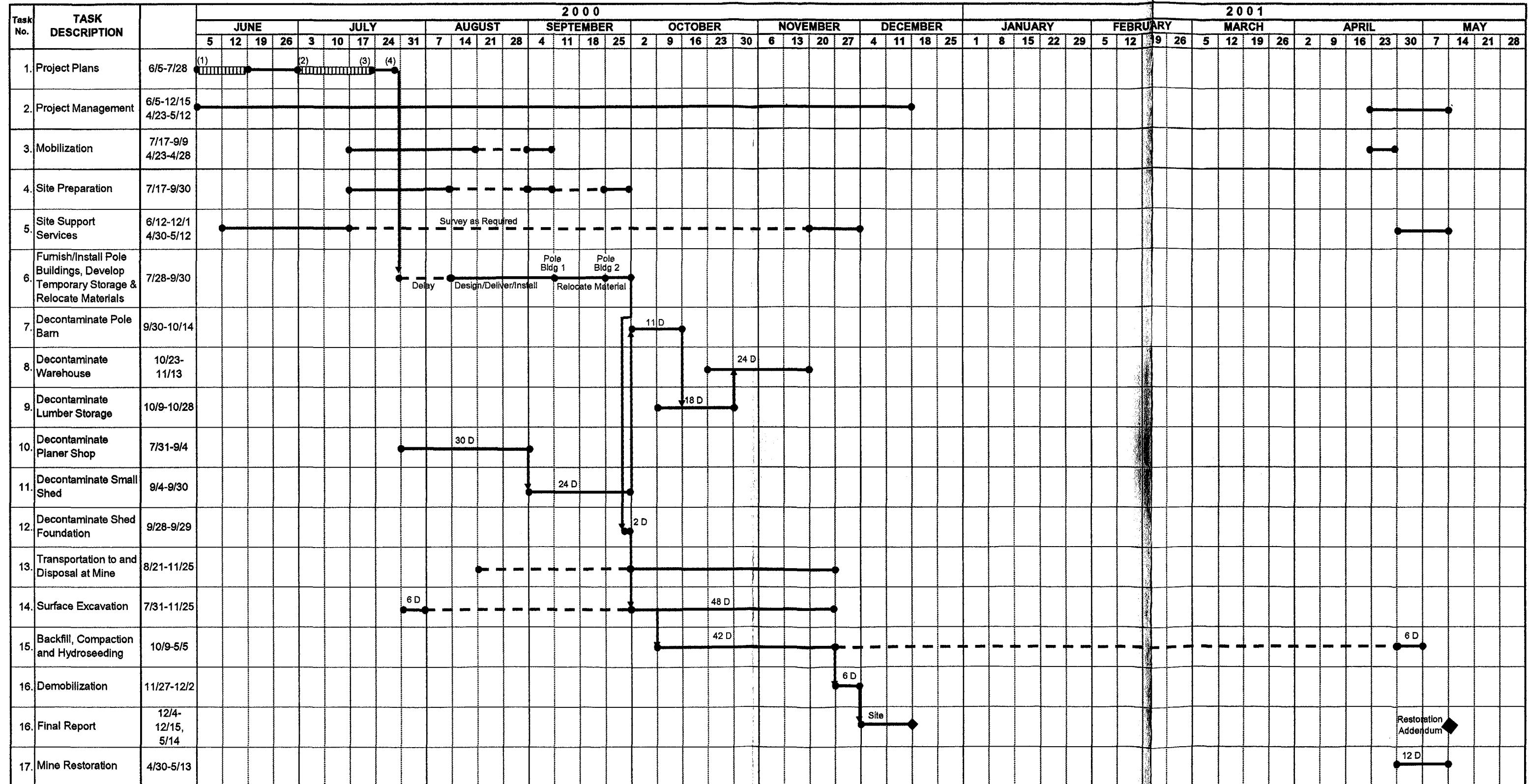
Signature

Date

Printed Name of Signer

Implementation Schedule for Removal Activities - Removal of Asbestos and Vermiculite at the Export Plant, Libby Asbestos Site

The actual full time allocation required is 20 weeks from the date of approval of Work Plan through completion of site backfill/grading. The overall 20 weeks of removal action requirements allows for potential weather delays and other unknowns for which no float time has been included in this schedule.



LEGEND

 Full Time Activity
 EPA Activity

- (1) Delivery of Draft Plan
- (2) Delivery of Prefinal Supplemental Plans
- (3) Approval of Work Plan by EPA initiating start of restoration
- (4) Issuance of Approved Work Plan

Figure 4-1

Revised 8-16-00